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Attorneys for Defendant Las Vegas Metropolitan Police Department

UNITED STATES DISTRICT COURT**STATE OF NEVADA**

JANET RAGGI,

Case No:

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the
State of Nevada; THE LAS VEGAS POLICE
PROTECTIVE ASSOCIATION METRO, INC.,
a Nevada Not For Profit Corporation; DONALD
LEMMONS, an individual and DOES I through
XXI, inclusive;

Defendants.

**DEFENDANT LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S NOTICE OF
REMOVAL**

TO: THE UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Petitioner, Las Vegas Metropolitan Police Department ("Defendant LVMPD"), by and
through their attorney of record, Craig R. Anderson, Esq., of the law firm of Marquis & Aurbach,
notices the removal of this action from the Eighth Judicial District Court of the State of Nevada
to the United States District Court for the District of Nevada and, in support thereof, states as
follows:

1. Defendant LVMPD is named in the above-entitled action commenced in
the Eighth Judicial District Court, in and for the County of Clark, Case No. A567118,
Department No. XX and now pending in that Court.

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2. Service of the Summons and Complaint was made on Defendant LVMPD on July 14, 2008. Copies of the Summons and Complaint are attached hereto as **Exhibits A & B.**

3. No further proceedings have been had in this matter in the Eighth Judicial District Court, State of Nevada.

4. The Complaint alleges violations of Title VII of the Civil Rights Act of 1964.

5. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §1331 in that it is an action arising under Title VII of the Civil Rights Act of 1964. Pursuant to 28 U.S.C. §1441, Defendant LVMPD is therefore entitled to remove this action to this court.

6. Thirty days have not elapsed since Defendant LVMPD was served with the Summons and Complaint in this action. Copies of the Summons and Complaint are attached hereto as Exhibit A and B, constituting all of the papers and pleadings served on Defendant LVMPD.

7. According to the Court records, Defendant Las Vegas Police Protective Association Metro, Inc. was served with the Complaint on July 15, 2008. Defendant Las Vegas Police Protective Association Metro, Inc., consents to this removal.

8. According to the records, Defendant Donald Lemons has yet to be served.

9. A true and correct copy of this Notice of Removal is being filed this date with the Clerk of the Eighth Judicial District Court of Nevada.

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1 10. Based on the foregoing, Defendant LVMPD removes the action now
2 pending in the Eighth Judicial Court of Nevada, in and for the County of Clark, as Case No.
3 A567118, to this Court.

4 Dated this 21 day of July, 2008.

5
6 MARQUIS & AURBACH

7
8 By 
9 CRAIG R. ANDERSON, ESQ.
10 Nevada Bar No. 6882
11 LISA A. MCCLANE, ESQ.
12 Nevada Bar No. 10139
13 10001 Park Run Drive
14 Las Vegas, Nevada 89145
15 Attorneys for Defendant LVMPD

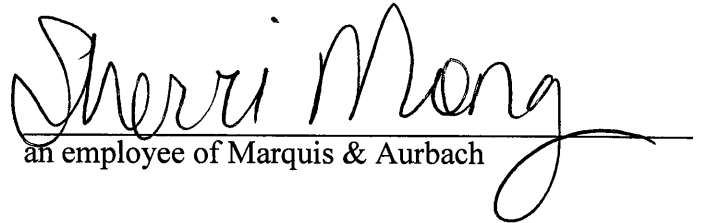
CERTIFICATE OF MAILING

I hereby certify that on the 22nd day of July, 2008, I served a copy of the foregoing
**DEFENDANT LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S NOTICE OF
REMOVAL** upon each of the parties by depositing a copy of the same in a sealed envelope in
the United States Mail, Las Vegas, Nevada, First-Class Postage fully prepaid, and addressed to:

Peter L. Chasey, Esq.
3295 N. Fort Apache Rd., 110
Las Vegas, NV 89129
Attorney for Plaintiff

Katherine A. Werner, Esq.
201 Las Vegas Blvd., South, #200
Las Vegas, NV 89101
Attorney for LVPPA

and that there is a regular communication by mail between the place of mailing and the place(s)
so addressed.


an employee of Marquis & Aurbach